

## Response to TCEQ comments on the Equipment Decon Plan (Enterprise Site) 04.14.2019

This latest set of comments was received on 04.14.2019, and discussed at length with Bob Patton of TCEQ. The outcome of this discussion was that the following edits and clarifications will satisfy the comments provided by TCEQ.

### General Comments

- Any recovered materials are assumed to be hazardous waste until a determination has been made in accordance with 30 Texas Administrative Code (TAC) 335 Subchapter R and should be managed as such. Until the Waste Management Plan is approved by the UC, all wastes generated during this incident are being handled and transported to the ITC facility for storage in accordance with the immediate response exemption and the draft Waste Management Plan. Determination and characterization of wastes generated during this emergency response is detailed in the Waste Management Plan.

- Define all acronyms, or provide a glossary

Definitions added to acronyms

### Section 1. No Comment

### Section 2.

- Revise to add GPS coordinates of the site and a secondary contact person and phone number. Details added to plan

### Section 3.

- Clarify how any waste generated from site preparation will be stored and properly disposed.

Dust, sediment and debris have been sept to the side of the decon area and is the responsibility of the landowner. Clarification added to plan

- Revise the plan to clarify under whose direction the final site walk-through will be conducted. This was conducted by the Decon Group Supervisor, clarified in the Plan

### Section 4.

- Reiterate all equipment explained in Section 1 which will go through the decontamination process.

Section 4 lists the equipment that will go through decon operations: small response boats, trailers, pumps, skimmers, pressure washers. Note that boom will no longer be deconned, and references to boom decon have been removed throughout the document.

- Fix the spacing in the second paragraph and missing period in the third paragraph, first sentence. Edited

- Specify how immersed equipment such as booms will be transported from the operations area to the decontamination site without risk of dripping waste onto uncontaminated roadways and/or waterways along the way. Boom is no longer covered by this plan. In reality, we do not see released materials “dripping” from response equipment. However, vessels and other equipment will be wiped down at the launch site to prevent any secondary contamination. This is detailed in the plan.

- Clarify what procedures will be used for collecting wipe samples, what frequency will be specified (i.e. one per X sq feet of surface area), what wipe samples will test for, and what criteria they will be compared to in order to determine whether decontamination is complete. TCEQ recommends collecting rinsate samples off of the equipment and compare test results to TRRP Tier 1 drinking water PCLs. Wipe samples are not

collected. A wipe test is conducted, which involves wiping sorbent material or a rag to confirm that no transferable material remains. Clarified in the plan.

- Properly collected solid samples are analyzed for all target chemicals of concern using method quantitation limits that are at or below background levels in mg/kg. Conversely if the final soil analytical results do exceed background specifically, the release will be subject to TRRP. The comparison with baseline and post-operational samples are provided in Section 16

Section 5. No Comment

Section 6. No Comment

Section 7.

- Documentation should include any sample results collected. No wipe samples are being collected during decon operations. Baseline and post-operational sampling is detailed in the appended sampling plan.

Section 8.1

- Add the "Work Area Air Sampling and Analysis Plan" as an attachment. This plan has been approved by UC, which includes TCEQ. Attachment of separate plans is not recommended since any revisions to the plans may be missed in the attachment. The plan can be provided if requested. Clarification has been added to confirm that the Air SAP shall be kept on site along with the decon plan.

Section 8.2 No Comment

Section 8.3

- Refrain from referencing recovered waste or decon generated waste as "recovered material" or "material". Released material, recovered material is the terminology that has been accepted by the Unified Command.
- Clarify why the sentence "During heavy rain, the decon pools and lined areas ..." indicates "may be covered," rather than suggested language: **will** be covered with poly liners **to minimize rainwater ingress and to reduce the generation of waste**. Text edited as suggested

Section 9.

- Address proper coverage of the roll-offs which contain damaged booms to minimize rain infiltration. This part covered the storage of damaged boom, which is no longer included in the decon plan
- Clarify how the boom will be transported from the operations area to prevent spillage of waste materials on uncontaminated public roadways or waterways. Boom is no longer being handled in the decon plan
- Clarify whether boom designated as "beyond repair" will be returned to the owner or condemned as waste. If the boom can no longer be used for its intended purpose, it becomes a waste. Boom is no longer being handled in the decon plan

Section 10.

- How will response vessels be transported to the decontamination site from the operations area to prevent contamination of waterways? As discussed previously, vessels going through the demob and decon process are not "dripping" with oil. The cleaning process is required to remove any residue that may be adhering to response vessels and equipment.
- Clarify or address a gross decontamination procedure for self-powered equipment. Clarification is added that section 10 also covered self-powered equipment.

Section 11.

- • Revise to address the generation of waste and compliance with TCEQ and EPA rules or regulations concerning packaging, labeling, marking, placarding, accumulation time, and recordkeeping requirements. **Waste handling is conducted in accordance with the draft Waste Management Plan - this is repeated throughout the document.**

#### Section 12.

- • Equipment owners should be given copy of any relevant analytical results demonstrating decontamination. **analytical results are not anticipated – visual inspection and wipe test only.**
- • Clarify what procedures will be in place to ensure that contamination is not spread into the workers break area on PPE, shoes, clothing, etc. This is added in the appended Site Safety Plan

#### Section 13.

- • Add the “Work Area Air Sampling and Analysis Plan” as an attachment. **See previous comment relating to attachment of separate plans**

#### Section 14

- Edit citation to reflect 29 CFR 1910.120 – Hazardous Waste Operations and Emergency Response (HAZWOPER) **edited**

#### Section 15. No Comment

#### Section 16.

- • Add TCEQ to the joint survey. **Added. EPA have stated that they do not need to be on the survey.**
- • Clarify if the final soil analytical results do exceed background, the release will be subject to TRRP. **Clarified**

#### Section 17.

- • Please add information to identify purple object in the waterway on the Legend (near the northwest 650’ marker). **This object has been removed from the plan.**

### Decon Site Sampling Plan

#### General

- Revise the plan to address how sampling data will be used to establish baseline conditions, determine whether the site was impacted by decon activities, and whether cleanup is achieved. **This is detailed in section 16, which is now referenced**
- Revise the plan throughout to reference and conform to the requirements of the TCEQ Quality Assurance Project Plan (QAPP) and SW-846. Procedures for hazardous waste sampling, and handling of samples, must comply with the TCEQ QAPP for purposes of Quality Assurance/Quality Control (QA/QC). The Sampling Plan (or Waste Handling and Management Plan) should explicitly reference SW-846–Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods. See SW-846 Chapters 1, 2, 9, and 11 for descriptions of accepted sampling methods, plans, QA/QC, and relevant procedures. American Society for Testing and Materials (ASTM) methods may be substituted with prior approvals in waste characterization and sampling, or in cases where the ASTM method is specified in regulations. **Reference to the QAPP and SW-846 have been added throughout**
- Title 30 of the Texas Administrative Code Section 25.1 states that the commission may accept environmental testing laboratory data and analyses for use in commission decisions regarding any matter under the commission's jurisdiction relating to permits or other authorizations, compliance matters, enforcement actions, or corrective actions only if the data and analyses are prepared by an environmental

testing laboratory accredited by the commission under this chapter, except as provided in §25.6 of this title (relating to Conditions Under Which the Commission May Accept Analytical Data). Revise the plan as necessary to reflect this requirement. **The requirement for a NELAC-accredited and Texas certified laboratory is added for both soil and water.**

Section 1: No Comment

Section 2: No Comment

Section 3

- Revise the plan to include TPH and any other constituents identified in samples elsewhere. **As previously discussed with Nicole Weist, TPH was not considered since the BTEX and PAHs will be indicative of any TPH. In addition, the samples have already been collected prior to lining of the site, to prevent any delay of decontamination of response equipment. However, a note has been added that TPH will be quantified if sample volumes allow.**

Section 3c

- Table 4-2: Provide logic for water samples on the selected analytes chosen. **Parameters are based on the knowledge gained in the field over the past weeks, including the components identified in outfall 002**

Section 3.D.1. No Comment

Section 3.D.2. No Comment

Section 3.D.3.

- Table 3.D.3-1: the row for VOCs contains placeholders rather than information. Please complete the table. **Detail added**
- Table 3.D.3-1: Provide logic for the soil samples on the selected analytes chosen (i.e., PAH vs TPH). **Parameters are based on the knowledge gained in the field over the past weeks, including the components identified in outfall 002.**

Section 4: No comment

Section 5: No comment

**Boom Release from Decon form:** No Comment

**Certificate of Decontamination:** No Comment

**Degreaser SDSs:** No Comment

**Site Specific Safety Plan:**

- The Health and Safety Plan is missing the nearest hospitals. **Hospitals added**